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October 14, 2021

VIA ECF FILING

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Defendant Vali's request for an extension of time to complete briefing is granted. The briefing schedule is amended as follows: Defendants' oppositions due October 28, 2021; Plaintiffs' reply due November 1, 2021.

It is SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: 10/14/2021
New York, New York

Re: Ballast v. Workforce7 Inc., Consolidated Edison Company of New York, Inc., Vali Industries, Inc., and Ronald Hilton, et al.
Civil Action No. 20-cv-3812 (ER)

Dear District Judge Ramos:

This office represents Vali Industries, Inc., (the "Defendant"). Defendant hereby requests a two-week extension of the deadline for each Defendant to submit their respective oppositions to Plaintiffs' August 9, 2021 Motion for Conditional Certification (Dkt. Nos. 94-96).

The basis for this extension is the undersigned has been suffering from COVID. While the last request for a two-week extension (Dkt 99, filed Sept 23, 2021) was optimistically premised on the notion that I would quickly get back on my feet. In reality, COVID was far more incapacitating and prolonged than I had imagined. Accordingly, I am only now back on my feet and need the additional time requested in order to prepare an appropriate opposition. Additionally, there is outstanding discovery the parties will exchange within the next two weeks, which may be used in support or defense of the parties' motion.

Accordingly, if the Court grants the foregoing extension, Defendants' oppositions will be extended from October 14 through and including October 28, and Plaintiff's reply brief would be extended from October 21 to and including November 1. This is the third request for an extension of the foregoing deadlines, which is made with all parties' consent.

Thank you in advance for your consideration of the foregoing.

Respectfully Submitted,

/s/ Justin R. Marino

Justin R. Marino
Attorneys for Defendant
Vali Industries, Inc.

cc: Plaintiffs' Counsel (via ECF only)